

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND
1 CONGRESS STREET, SUITE 1100,
BOSTON, MA. 02114-2023

DATE: December 17, 2003 (Memo to File)
FROM: Search & Cost Recovery Section
TO: File
SUBJ.: (Interview) SSID #
(Wells G & H)

MEMORANDUM

ENFORCEMENT CONFIDENTIAL
ATTORNEY/CLIENT PRIVILEGE

Person Interviewed:

On Wednesday, December 10, 2003, I traveled to North Reading, Massachusetts to meet with the above-named individual. Upon arrival, I was greeted at the door by a gentleman that introduced himself as . I identified myself to him and advised him as to why I was there. He invited me in by way of side stairs. Upon entering, I was greeted by , she invited me into the dining area, where was already seated. advised me of the following:

1. He worked at Whitney Barrel at 256 Salem Street, Woburn, MA from around 1957 until 1982. This was from the time he was 17 years of age for 25 years, off and on.
2. He performed many functions while there. He drove truck for pick up and delivery of barrels and tanks to and from Whitney Barrel, worked with the tank salvaging outfit at Whitney Barrel, and he was a welder for Whitney Barrel, wherein he repaired the damaged tanks

that came in.

8. Some of the barrels coming in for recycling came in with rubber linings, hazardous material warning labels. We knew this was “bad stuff” because of the labels. We would take these barrels down the back road (Woburn Road) and dump the contents in the sand. This was done on a regular basis but not too often. In other words, it was part of the process. These barrels were brought to Whitney Barrel.

9. **Sylvania**, (located @ Stop & Shop Mall @ 128 & 38), sent drums to Whitney Barrel Company for recycling. Some of their barrels had “corrosive” residues in them. Barrels had “hazardous” labels on them. Some of the drums would contain a liquid type residue that would seem to evaporate before it hit the sand.

10. The barrels that went inside to the process with residue in them were dumped into the floor drain. This was an approximately 3-foot grated hole located basically in the middle of the floor. “Everything” went down this drain and this drain went from the floor out to the sewer overflow.



May 4, 2007

U.S. Environmental Protection Agency
Martha Bosworth, Enforcement Coordinator
Office of Site Remediation and Restoration (HBS)
One Congress Street, Suite 1100
Boston, MA 02114

Re: Response to CERCLA Section 104 Request for Information for the
Whitney Barrel Company at the Wells G & H Superfund Site, Woburn,
Massachusetts

Dear Ms. Bosworth:

On January 23, 2007, EPA Region I addressed a CERCLA § 104 Request for Information ("Request") for the Whitney Barrel Company at the Wells G & H Superfund Site, Woburn, Massachusetts, encompassing the period 1950-1985, to "OSRAM SYLVANIA, 100 Endicott Street, Danvers, MA 01923." Through discussions between counsel and Attorney Susan Scott of EPA, the deadline for responding was extended until May 4, 2007.

Based on discussions with Susan Scott, we understand that the Request seeks information with respect to a facility located at 100 Sylvan Road in Woburn, Massachusetts (the "facility"), during the period 1955-1973. In accordance with this clarification and direction, this response focuses on information related to that facility.

In accordance with the instructions included with the Request, we enclose an appropriately marked copy of the Response which includes confidential and private information, and a copy of the Response from which such information has been redacted.

Sincerely,

A handwritten signature in black ink, appearing to read "Albert P. Lelis, Jr.", written over a horizontal line.

Albert P. Lelis, Jr.

Enclosures

cc: Laurie Burt, Esq.
Karen L. Crocker, Esq.

0062-0167

OSRAM SYLVANIA
100 Endicott Street
Danvers, MA 01923
☎ (978) 777-1900

www.sylvania.com

**Response of OSRAM Sylvania to Information Request
Whitney Barrel Company at the Wells G & H Superfund Site
Woburn, Massachusetts**

Preliminary Statement

In a request for information (the "Request") addressed to "OSRAM Sylvania," dated January 23, 2007, the United States Environmental Protection Agency, Region I ("EPA") requested certain information and documents pursuant to Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § § 9601-9675, with respect to the former Whitney Barrel Company ("Whitney Barrel") at the Wells G & H Superfund Site in Woburn, Massachusetts (the "Site"). This response is provided on behalf of OSRAM SYLVANIA Inc. ("OSRAM"). Through discussions between our counsel and Attorney Susan Scott of EPA, the deadline for responding was extended until May 4, 2007.

Based on discussions with Susan Scott, we understand that the Request seeks information with respect to a facility located at 100 Sylvan Road in Woburn, Massachusetts (the "facility"), during the period 1955 - 1973. In accordance with this clarification and direction, this response focuses on information related to that facility.

Promptly upon receiving the Request, a diligent investigation was undertaken to locate any responsive records and to identify current and past employees with first-hand knowledge about the facility during the time period 1955-1973 (the "relevant period"). In preparing this response, OSRAM has endeavored to contact current employees likely to have personal knowledge of matters referred to in the Request. While not obligated to do so, OSRAM also endeavored to contact former employees identified as potentially having personal knowledge of matters referred to in the Request. OSRAM has also reviewed documents identified as possibly containing responsive information. This effort has been substantially hampered by the length of time that has passed since the matters referred to herein occurred, and the fact that the facility ceased operations near the end of the relevant period, more than 30 years ago. To date, the investigation has uncovered no information or documents that establish that any hazardous substances generated by the Respondent at the facility were disposed of at Whitney Barrel.

The answers set forth herein, subject to inadvertent or undiscovered errors or omissions, are based on and therefore necessarily limited by the records and information currently in the possession of or available to OSRAM or recollected by current and past employees of OSRAM, thus far discovered in the course of the preparation of this response. OSRAM reserves the right to supplement this response in the event that it locates additional information or documents which would make such supplementation appropriate.

GENERAL OBJECTIONS

OSRAM objects to the information request insofar as it exceeds EPA's authority under CERCLA because it seeks information which is neither relevant nor likely to lead to the discovery of relevant information.

OSRAM objects to the information request insofar as it seeks information regarding privileged documents and privileged communications, including without limitation material subject to attorney-client protection and the work-product doctrine.

OSRAM objects to the information request to the extent that it is vague, overbroad, and unduly burdensome, and to the extent it requests OSRAM to produce information or documents which are already in the possession of EPA.

OSRAM objects to the information request insofar as it seeks to impose duties or require the performance of acts beyond the scope of applicable laws.

Subject to and without waiver of its general and specific objections, OSRAM makes the following response to the information request.

INFORMATION REQUEST QUESTIONS

1. General Information About Respondent

NOTE: All questions in this section refer to the present time unless otherwise indicated.

a. *Provide the full legal name and mailing address of the Respondent.*

OSRAM SYLVANIA Inc.
100 Endicott Street
Danvers, MA 01923

b. *For each person answering these answers on behalf of Respondent, provide:*

- i. *full name;*
- ii. *title;*
- iii. *business address; and*
- iv. *business telephone number.*

Albert P. Lelis, Jr.
Corporate EHS Manager
OSRAM SYLVANIA Inc.
100 Endicott Street
Danvers, MA 01923
(978) 750-2611

c. *If Respondent wishes to designate an individual for all future correspondence concerning this Site, including any legal notices, please so indicate here by providing that individual's name, address and telephone number.*

Christine Sheedy
OSRAM SYLVANIA Inc.
100 Endicott Street
Danvers, MA 01923
(978) 750-2388

James A. Gass
OSRAM SYLVANIA Inc.
100 Endicott Street
Danvers, MA 01923
(978) 750-2111

With copies to:

Laurie Burt, Esq.
Karen L. Crocker, Esq.
Foley Hoag LLP
155 Seaport Blvd.
Boston, MA 02210-2600
(617) 832-1000

d. *Provide the names of all Superfund sites in Region I (New England) for which Respondent has received a 104(e) Request for Information Letter from EPA.*

- Charles George Land Reclamation Trust, Tyngsboro, Massachusetts
- Cannons Engineering Corp. Sites, Bridgewater & Plymouth, Massachusetts and Londonderry & Nashua, New Hampshire.
- Landfill and Resource Recovery Site, North Smithfield, Rhode Island
- Loring Avenue Landfill, Salem, Massachusetts
- Silresim Chemical Corp., Lowell, Massachusetts
- Re-Solve Inc., North Dartmouth, Massachusetts
- Peterson/Puritan, Inc., Cumberland, Rhode Island

2. Respondent's Legal Status

NOTE: *All questions in this section refer to the present time unless otherwise indicated.*

OSRAM understands these questions to inquire into the financial viability of the Respondent, which is not at issue where, as here, the Respondent is a large corporation. Responsive information has been provided to the extent readily available. If EPA believes additional information of a historical nature is required, OSRAM will endeavor upon EPA's request to obtain such information from corporate archives.

a. *If the Respondent has ever done business under any other name;*

- i. *list each such name; and*
- ii. *list the dates during which such name was used by Respondent.*

The present OSRAM is the result of the January 1993 acquisition by OSRAM Acquisition Corporation, a subsidiary of Osram GmbH, of what was then known as GTE Products Corporation, a subsidiary of GTE Products of Connecticut Corporation, which in turn was a subsidiary of GTE Corporation. On information and belief, GTE Products Corporation was initially incorporated in 1958 as SEPCO, Inc. In 1959, SEPCO, Inc. changed its name to Sylvania Electric Products Inc. In 1970, the corporation changed its name first to GT&E Sylvania Incorporated and then to GTE Sylvania Incorporated. In 1980, the corporation changed its name to GTE Products Corporation. In 1993, following the acquisition of the corporation by OSRAM Acquisition Corporation, its name was changed to OSRAM SYLVANIA Inc.

b. *If Respondent is a corporation, provide:*

- i. *the date of incorporation;*
- ii. *state of incorporation; and*
- iii. *agent for service of process.*

OSRAM was incorporated in Delaware on December 24, 1958, as SEPCO, Inc. CT Corporation System is its agent for service of process.

c. *If Respondent was a business entity other than a corporation, provide:*

- i. *the type of organization (sole proprietorship, partnership, trust, etc.)*
- ii. *the date the business began; and*
- iii. *owner, managing partner, or other equivalent person in charge.*

N/A

d. *If Respondent is, or was at any time during the period being investigated, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the nature of each such corporate relationship, including but not limited to:*

- i. *a general statement of the nature of the relationship;*
- ii. *the dates such relationship existed;*
- iii. *the percentage of ownership of Respondent that is held by such other entity; and*
- iv. *for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities.*

Osram is presently a wholly owned subsidiary of Siemens Corp. and has been since March 31, 1995. The address of Siemens Corp. is:

1301 Avenue of the Americas
New York, NY 10019

Between 1977 and 1993, OSRAM, then known as GTE Products Corporation, was a wholly owned subsidiary of GTE Products of Connecticut Corporation. OSRAM refers to the response to Item 2(a) of this Request.

e. Identify all of Respondent's predecessors-in-interest and provide a description of the relationship between Respondent and each of those predecessors-in-interest.

OSRAM refers to the response to Item 2(a) of this Request.

f. If Respondent no longer exists as the same legal entity it was during the period being investigated because of transactions involving asset purchases or mergers, provide:

- i. the titles and dates of the transactions and copies of documents that embody the terms of such transactions (i.e., purchase agreements, merger and dissolution agreements, etc.);*
- ii. the identities of the seller, buyer, and any other parties to such transactions;*
- iii. a brief statement describing the nature of the asset purchases or mergers; and*
- iv. a brief statement describing and copy(s) of documents embodying any/all indemnification agreements.*

OSRAM refers to the response to Item 2(a) of this Request.

g. If Respondent has filed for bankruptcy, provide:

- i. the U.S. Bankruptcy Court in which the petition was filed;*
- ii. the docket numbers of such petition;*
- iii. the date the bankruptcy petition was filed;*
- iv. whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or other provision; and*
- v. a brief description of the current status of the petition.*

N/A

3. Respondent's Operations

NOTE: All questions in this section refer to the period being investigated (1950-1985) unless otherwise indicated.

ALSO NOTE: All questions in this Section refer to facilities owned or operated by the Respondent within Massachusetts, Rhode Island, New Hampshire or Maine and to any other facility owned or operated by Respondent which had any business or other contractual relationship with Whitney Barrel Company. Please note that it is not necessary to identify or provide information about any facilities that are engaged solely in clerical/office work.

a. *Provide the complete addresses of Respondent's plants and other buildings or structures where Respondent carried out its operations.*

As explained above, EPA has narrowed its Request such that Respondent is required only to respond with regard to a facility located at 100 Sylvan Road, Woburn, Massachusetts, during the period 1955-1973.

b. *Provide a brief description of the nature of Respondent's operations at each location including:*

- i. *the date such operations commenced and concluded;*
- ii. *the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location; and*
- iii. *the type of products manufactured, recycled, recovered, treated or otherwise processed in these operations.*

On information and belief, the facility began operating in 1952 and ceased operating in 1970. The facility manufactured transistors, germanium diodes, microwave diodes, transmitting and receiving tubes, anti-transmitting and receiving tubes, magnetrons, integrated circuits and some glass parts and products. The facility also had employees engaged in supportive activities such as accounting, marketing, research and development, engineering, equipment design and manufacturing, and maintenance.

c. *Enclosure F provides a list of chemical constituents conclusively identified to date at the Site. For each facility identified in 3.a above, identify, to the best of your knowledge, any chemical constituents listed in Enclosure F that:*

- i. *would have been produced, processed, or used in connection with facility operations; or*
- ii. *would have been present in materials produced, processed, or used in connection with facility operations.*

On information and belief, the following raw materials were used at the facility: germanium, silicon, ceramic, glass, tungsten, molybdenum, silver, platinum, gold salts, mica, kovar, mercury, sulfuric acid, hydrochloric acid, acetone, pure alcohol, polyvinylchloride, and triad. Other types of acids and some radioactive materials in liquid form were also used in the manufacturing operations.

d. *If the nature or size of Respondent's operations changed over time, describe those changes, the dates they occurred, and the nature of the current business at each such location, including but not limited to a brief description of the major products or services Respondent manufactures or provides.*

On information and belief, when the facility opened in 1952, it manufactured transistors, germanium diodes, microwave diodes, transmitting and receiving tubes, anti-transmitting and receiving tubes, magnetrons and some glass parts and products in a single building. In 1958, the germanium diodes manufacturing operations were

transferred to a facility in Hillsboro, New Hampshire. In the early 1960s, the transmitting and receiving tube, anti-transmitting and receiving tube, and magnetron manufacturing operations were transferred to Williamsport, Pennsylvania. In 1963, an addition to the building was constructed for the purpose of housing the microwave diode manufacturing operations. In the mid-1960s, the facility began manufacturing integrated circuits.

The facility ceased manufacturing operations in 1970 and was completely closed by 1971 or 1972. From the time the facility ceased manufacturing in 1970 until it was completely closed in 1971 or 1972, only about 20 employees remained for the purpose of closing out the facility, including the sale or transfer of equipment and materials. On information and belief, the microwave diode manufacturing operations were sold to Alpha Industries.

OSRAM no longer owns the facility and is unaware of the nature of business currently conducted there.

e. List the products Respondent manufactured, recycled, recovered, treated, or otherwise processed in these operations.

OSRAM refers to the response to Item 3(b) of this Request. On information and belief, after being manufactured, diodes were tested to ensure that they could conduct radio signals. Diodes that failed testing but still conducted an electrical current were collected in 55 gallon drums and sold to a toy manufacturer.

f. In general terms, list the types of raw materials used in the operations.

OSRAM refers to the response to Item 3(c) of this Request.

g. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:

- i. the types of material used to clean/maintain this equipment/machinery;*
- and*
- ii. the monthly or annual quantity of each material used.*

On information and belief, the area of the facility used for plating was shut down periodically for several hours for cleaning. OSRAM has been unable to obtain any further information responsive to this Item of the Request.

h. Describe the method used to clean up spills of liquid or solid material during operations, including but not limited to:

- i. the type of materials spilled in operations;*
- ii. the materials used to clean up these spills;*
- iii. the methods used to clean up those spills; and*
- iv. where the materials used to clean up those spills were disposed of.*

OSRAM has been unable to obtain any information responsive to this Item of the Request.

i. *Provide a schematic diagram or flow chart that fully describes and/or illustrates the operations at the Site.*

OSRAM has been unable to obtain information sufficient to respond to this Item of the Request.

j. *Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had any contact with Whitney Barrel Company.*

OSRAM has identified the following former employees who have knowledge of or information about the subject matter of some of the foregoing questions in Item 3 of this Request:

See Attachment A (Personal Privacy Information)

4. *Respondent's Wastes and Waste Streams (including By-Products)*

NOTE: All questions in this section refer to the period being investigated (1950-1985) unless otherwise indicated.

As explained above, EPA has narrowed its Request such that Respondent is required only to respond with regard to the period 1955-1973.

a. *Complete the enclosed "Waste Survey" checking each substance present in Respondent's wastes or by-products and providing all requested information for each such substance that is checked.*

OSRAM has been unable to obtain information sufficient to complete the Waste Survey. On information and belief, after being manufactured, diodes were tested to ensure that they could conduct radio signals. Diodes that failed testing but still conducted an electrical current were collected in 55 gallon drums and sold to a toy manufacturer.

b. *For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:*

- i. *its physical states;*
- ii. *its name and chemical composition;*
- iii. *the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and*
- iv. *the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.*

OSRAM refers to its response to Item 4(a) of the Request. OSRAM has been unable to obtain further information responsive to this Item of the Request.

c. Describe how each type of waste was collected and stored at Respondent's operation prior to disposal/recycling/sale/transport, including:

- i. the type of container (e.g. 55 gal. drum, tank, dumpster, etc.);*
- ii. the colors of the containers;*
- iii. any distinctive stripes or other markings on those containers;*
- iv. any labels or writing on those containers (including the content of those labels);*
- v. whether those containers were new or used;*
- vi. where each type of waste was collected/stored; and*
- vii. if those containers were used, a description of the prior use of the containers.*

OSRAM refers to its response to Item 4(a) of the Request. OSRAM has been unable to obtain further information responsive to this Item of the Request.

d. Identify (see Definitions) the person(s) who was responsible for collecting and managing each type of waste.

OSRAM has been unable to obtain information sufficient to respond to this Item of the Request.

e. For each location, identify and provide copies of all surveys or studies conducted between 1950 and 1985 about its waste management practices including but not limited to disposal, treatment, storage, recycling, or sale of waste.

OSRAM has been unable to obtain information sufficient to respond to this Item of the Request.

f. Identify all former or current employees and all other person who have any knowledge of or information about the subject matter of any of the foregoing questions or who had contact with Whitney Barrel Company.

OSRAM has identified the following former employee who has knowledge of or information about the response to Item 4(a) of this Request:

See Attachment A (Personal Privacy Information)

OSRAM has been unable to obtain further information responsive to this Item of the Request.

5. Respondent's Disposal/Treatment/Storage/Recycling/Sale of Waste (including By-Products):

NOTE: All questions in this section refer to the period being investigated (1950-1985) unless otherwise indicated.

ALSO NOTE: Your response to questions in this section must refer to all locations to which Respondent sent its wastes.

As explained above, EPA has narrowed its Request such that Respondent is required only to respond with regard to the period 1955-1973.

a. Identify (see Definitions) all individuals who currently have and those who have had responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes, including, but not limited to barrels or empty barrels.

OSRAM has been unable to obtain information sufficient to respond to this Item of the Request.

b. Identify (see Definitions) all individuals who currently have and those who have had knowledge of the disposal, treatment, storage, recycling, or sale of Respondent's wastes, including, but not limited to barrels or empty barrels.

OSRAM refers to its response to Item 4(f) of the Request.

c. Identify (see Definitions) all individuals who currently have and those who have had responsibility for Respondent's environmental matters.

OSRAM has been unable to obtain information sufficient to respond to this Item of the Request.

d. For the previous three responses, also provide each individual's:

- i. job title;
- ii. duties;
- iii. dates performing those duties;
- iv. supervisors for those duties;
- v. current position or, if such individual is no longer employed by Respondent, the date of the individuals' resignation; and
- vi. the nature of the information possessed by such individuals concerning Respondent's waste management.

Leo J. White is currently retired. From 1956 to about 1968, Mr. White was an accountant at the facility, with responsibility for customer accounts. From about 1968 to about 1971, he was controller, with responsibility for supervising the entire accounting department at the facility. Mr. White recalls that diodes that failed radio signal testing but still conducted an electrical current were collected in 55 gallon drums and sold to a toy manufacturer.

e. *Describe the containers used to take each type of waste from Respondent's operation, including but not limited to:*

- i. *the type of container (e.g. 55 gal. drum, tank, dumpster, etc.);*
- ii. *the colors of the containers;*
- iii. *any distinctive stripes or other markings on those containers;*
- iv. *any labels or writing on those containers (including the content of those labels);*
- v. *whether those containers were new or used; and*
- vi. *if those containers were used, a description of the prior use of the containers.*

OSRAM refers to its response to Item 4(a) of the Request. OSRAM has been unable to obtain further information responsive to this Item of the Request.

f. *For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.*

OSRAM refers to its response to Item 4(a) of the Request. OSRAM has been unable to obtain further information responsive to this Item of the Request.

g. *Provide copies of such contracts and other documents reflecting such agreements or arrangements.*

OSRAM has been unable to obtain information sufficient to respond to this Item of the Request.

h. *State where Respondent sent each type of its waste, including barrels and empty barrels, for disposal, treatment, or recycling.*

OSRAM refers to its response to Item 4(a) of the Request. OSRAM has been unable to obtain further information responsive to this Item of the Request.

i. *Identify (see Definitions) all entities and individuals who picked up waste, including barrels, from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request).*

OSRAM refers to its response to Item 4(a) of the Request. OSRAM has been unable to obtain further information responsive to this Item of the Request.

j. *If Respondent transported any of its wastes away from its operations, please so indicate and answer all questions related to "Waste Carriers" with reference to Respondent's actions.*

OSRAM refers to its response to Item 4(a) of the Request. OSRAM has been unable to obtain further information responsive to this Item of the Request.

k. *For each type of waste specify which Waste Carrier picked it up.*

OSRAM refers to its response to Item 4(a) of the Request. OSRAM has been unable to obtain further information responsive to this Item of the Request.

l. *For each type of waste, state how frequently each Waste Carrier picked up such waste.*

OSRAM has been unable to obtain any information responsive to this Item of the Request.

m. *For each type of waste state the volume picked up by each Waste Carrier (per week, month, or year).*

OSRAM has been unable to obtain any information responsive to this Item of the Request.

n. *For each type of waste state the dates (beginning & ending) such waste was picked up by each Waste Carrier.*

OSRAM has been unable to obtain any information responsive to this Item of the Request.

o. *Provide copies of all documents containing information responsive to the previous seven questions.*

OSRAM has been unable to identify any documents responsive to this Item of the Request.

p. *Identify (see Definitions) all of each Waste Carrier's employees who collected Respondent's wastes and waste containers.*

OSRAM has been unable to obtain any information responsive to this Item of the Request.

q. *Indicate the ultimate disposal/recycling/treatment location for each type of waste.*

OSRAM refers to its response to Item 4(a) of the Request. OSRAM has been unable to obtain further information responsive to this Item of the Request.

r. *Provide copies of all documents indicating the ultimate disposal/recycling/treatment location for each type of waste.*

OSRAM has been unable to obtain any documents responsive to this Item of the Request.

s. *Describe how Respondent managed pickups of each waste, including but not limited to:*

- i. *the method for inventorying each type of waste;*
- ii. *the method for requesting each type of waste to be picked up;*
- iii. *the identity of (see Definitions) the waste carrier employee/agent contacted for pickup of each type of waste;*
- iv. *the amount paid or the rate paid for the pickup of each type of waste;*
- v. *the identity of (see Definitions) Respondent's employee who paid the bills; and*
- vi. *the identity of (see Definitions) the individual (name or title) and company to whom Respondent sent the payment for pickup of each type of waste.*

OSRAM has been unable to obtain any information responsive to this Item of the Request.

t. *Identify (see Definitions) the individual or organization (i.e., the Respondent; the Waste Carrier, or, if neither, identify such other person) who selected the location where each of the Respondent's wastes were taken.*

OSRAM has been unable to obtain any information responsive to this Item of the Request.

u. *State the basis for and provide any documents supporting the answer to the previous question.*

N/A

v. *Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions.*

OSRAM refers to its response to Item 4(f) of the Request.

6. *Respondent's Environmental Reporting:*

NOTE: All questions in this section refer to the period being investigated (1950-1985).

As explained above, EPA has narrowed its Request such that Respondent is required only to respond with regard to the period 1955-1973.

a. *Provide all Resource Conservation and Recovery Act (RCRA) Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.*

Since RCRA had not been enacted during the period for which OSRAM is responding, Identification Numbers were not required and there were no such numbers.

b. *Identify (see Definitions) all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information.*

OSRAM refers to its response to item 6(a) of the Request.

c. *State the years during which such information was sent/filed.*

OSRAM refers to its response to item 6(a) of the Request.

d. *Identify (see Definitions) all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information.*

OSRAM refers to its response to item 6(a) of the Request.

e. *State the years during which such information was sent/filed.*

OSRAM refers to its response to item 6(a) of the Request.

f. *List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. §§ 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. §§ 1251 et seq. and equivalent state law.*

Most or all of these statutes had not been enacted during the period for which OSRAM is responding to the Request. OSRAM has been unable to obtain any information responsive to this Item of the Request.

g. *Identify (see Definitions) the federal and state offices to which such information was sent. Provide the full legal name and mailing address of the Respondent.*

OSRAM has been unable to obtain any information responsive to this Item of the Request.

7. *Information Concerning Respondent's Association with the Whitney Barrel Company*

NOTE: All questions in this section refer to the period being investigated (1950-1985).

As explained above, EPA has narrowed its Request such that Respondent is required only to respond with regard to the period 1955-1973.

a. *Please describe Respondent's business association with the Whitney Barrel Company.*

OSRAM has been unable to obtain any information responsive to this Item of the Request.

b. *Did your association with the Whitney Barrel Company involve the buying of drums or other size/type of containers? Unless your answer is an absolute "No", please explain. Include but do not limit your response to:*

- i. *the dates of each pickup and delivery;*
- ii. *the type(s) of container(s);*

- iii. *the size(s) of the container(s);*
- iv. *the condition of each container(s);*
- v. *the contents (including but not limited to empty barrel residues) of each container including*
 - (a) *the name of each material;*
 - (b) *the chemical composition of each material;*
 - (c) *the physical state of each material (e.g., solid, sludge, liquid);*
 - (d) *the volume of each material; and*
- vi. *please include all documentation relating to these transactions.*

OSRAM has been unable to obtain any information responsive to this Item of the Request.

c. Did your association with the Whitney Barrel Company involve the shipping, transport or selling of drums or other size/type of containers? Unless your answer is an absolute "No", please explain. Include but do not limit response to:

- i. *the dates of each pickup and delivery;*
- ii. *the type(s) of container(s);*
- iii. *the size(s) of the container(s);*
- iv. *the condition of each container(s);*
- v. *the contents (including but not limited to empty barrel residues) of each container including*
 - (a) *the name of each material;*
 - (b) *the chemical composition of each material;*
 - (c) *the physical state of each material (e.g., solid, sludge, liquid);*
 - (d) *the volume of each material; and*
- vi. *please include all documentation relating to these transactions.*

OSRAM has been unable to obtain any information responsive to this Item of the Request.

d. Did your association with the Whitney Barrel Company involve the cleaning and/or reconditioning of drums or other size/type of containers? Unless your answer is an absolute "No", please explain. Include but do not limit response to:

- i. *the dates of each pickup and delivery;*
- ii. *the type(s) of container(s);*
- iii. *the size(s) of the container(s);*
- iv. *the condition of each container(s);*
- v. *the contents (including but not limited to empty barrel residues) of each container including*
 - (a) *the name of each material;*
 - (b) *the chemical composition of each material;*
 - (c) *the physical state of each material (e.g., solid, sludge, liquid);*
 - (d) *the volume of each material; and*
- vi. *please include all documentation relating to these transactions.*

OSRAM has been unable to obtain any information responsive to this Item of the Request.

e. Did the Whitney Barrel Company ever perform any other service for you or your company? Unless an absolute "No", please explain. Include but do not limit your response to:

- i. the type of service(s);*
- ii. the frequency of the service(s);*
- iii. the date(s) of service(s); and*
- iv. please include any documentation relating to these transactions.*

OSRAM has been unable to obtain any information responsive to this Item of the Request.

f. Did Respondent ever pick up materials from other parties which were taken directly or indirectly to the Whitney Barrel Company (to be referred to as "customers" for purposes of this Information Request)? Unless your answer is an absolute "No", please explain.

OSRAM has been unable to obtain any information responsive to this Item of the Request.

g. Identify (see Definitions) all persons and entities from whom Respondent picked up materials which were taken directly or indirectly to the Whitney Barrel Company.

OSRAM has been unable to obtain any information responsive to this Item of the Request.

h. In addition to providing a list that identifies all such customers, provide for each pickup and delivery of materials to the Whitney Barrel Company:

- i. the dates of each pickup and delivery;*
- ii. the type of container(s);*
- iii. the size of the container(s);*
- iv. the condition of each container(s);*
- v. for each customer's materials taken to the Whitney Barrel Company describe:*
 - (a) the nature of each material;*
 - (b) the chemical composition of each material;*
 - (c) the physical state of each material (e.g., solid, liquid);*
 - (d) the volume of each material; and*
- vi. please include all documentation relating to your pickup and delivery of materials to the Whitney Barrel Company.*

OSRAM has been unable to obtain any information responsive to this Item of the Request.

i. *Identify (see Definitions) all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had contact with Whitney Barrel Company.*

OSRAM has been unable to obtain any information responsive to this Item of the Request.

8. Information About Others

a. *If you have any information concerning the operation of the Site or the source, content or quantity of materials placed/disposed at the Site which is not included in the information you have already provided, provide all such information.*

OSRAM has been unable to obtain any information responsive to this Item of the Request.

b. *If not already included in your response, if you have reason to believe that there may be persons, including persons currently or formerly employed by Respondent, who are able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.*

OSRAM has identified the former employees listed below, in addition to the former employees identified earlier in its response. OSRAM does not know whether the former employees listed below have any knowledge or documents responsive to this Request. OSRAM has no further identifying information for these former employees other than that listed below.

See Attachment A (Personal Privacy Information)

c. *If not already provided, identify all persons, including Respondent's current and former employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement or other handling of materials at, or transportation of materials to, the Site.*

OSRAM refers to the response to Item 8(b) of this Request.

9. Compliance with This Request

a. *Describe all sources reviewed or consulted in responding to this request, including but not limited to:*

- i. *the names of all individuals consulted;*
- ii. *the current job title and job description of each individual consulted;*
- iii. *the job title and job description during the period being investigated of each individual consulted;*
- iv. *whether each individual consulted is a current or past employee of Respondent;*

- v. *the names of all divisions or offices of Respondent for which records were reviewed;*
- vi. *the nature of all documents reviewed;*
- vii. *the locations where those documents reviewed were kept prior to review;*
and
- vii. *the location where those documents reviewed are currently kept.*

(i)-(iv)

Jean Agostinelli, is currently Vice President and Comptroller at GTE Operations Support Incorporated with responsibilities that include environmental matters. Ms. Agostinelli was not employed by Respondent during the relevant period.

Francis Connolly is currently retired. Mr. Connolly was employed by Respondent from 1956 to 1958 and then from 1960 to 1991. From 1956 to 1958 and from 1960 until the facility closed around 1971, Mr. Connolly was a clerk in the accounting department, and then an accountant for the integrated circuits manufacturing department, responsible for performing cost accounting functions. When the facility closed around 1971, Mr. Connolly was transferred to GTE Laboratories in Waltham, Massachusetts, where he continued to work as a manufacturing cost accountant.

Anna Garbulsky, currently a senior paralegal for Verizon Corporate Services, is responsible for providing research and assistance to the corporate legal department. Ms. Garbulsky was not employed by Respondent during the relevant period.

Albert P. Lelis, Jr. is currently Corporate Environmental Health and Safety Manager for Respondent, with responsibilities for environmental remediation, ISO 14001 implementation and maintenance and other EHS management systems. Mr. Lelis was not employed by Respondent during the relevant period.

Charles McBride, currently a paralegal for Verizon Services Operations, provides records management support, with responsibilities that include records retention and destruction. Mr. McBride was not employed by Respondent during the relevant period.

Chris Moss, currently the benefits manager for Verizon Communications, is responsible for the administration of retiree healthcare plans, pension payroll and disability. Mr. Moss was not employed by Respondent during the relevant period.

Gail Owens, currently a specialist for business operations support for Verizon Telecomm Human Resources Technology, is responsible for providing human resources information on an ad hoc basis. Ms. Owens was not employed by Respondent during the relevant period.

Debbie Robinson is currently the corporate records manager for Verizon Services Operations. Ms. Robinson was not employed by Respondent during the relevant period.

Christine Sheedy, currently a Risk Manager for Respondent, is responsible for directing risk management, insurance and corporate secretarial functions. Ms. Sheedy was not employed by Respondent during the relevant period.

Leo J. White is currently retired. Mr. White was employed by Respondent from 1956 until he retired in 1994. From 1956 to about 1968, Mr. White was an accountant at the facility with responsibility for customer accounts. From about 1968 to about 1971, he was controller, with responsibility for supervising the entire accounting department at the facility. From about 1971 through the end of the relevant period, he was controller at Wilber B. Driver Co., in Newark, New Jersey, then a subsidiary of Respondent.

Lorna M. White is currently retired. Ms. White was employed by Respondent from 1952 to 1963. She worked on various manufacturing lines, including glassblowing, microwave diode assembly, and transmitting and receiving tubes assembling. She also worked as an assistant in the engineering department.

(v)-(viii)

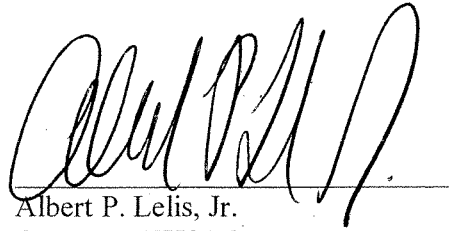
Former employee pension records and human resources data for Verizon Communications Inc. were searched electronically in order to identify current contact information for former employees of the facility.

OSRAM maintains an archive of historical documents. None of these documents were identified as being potentially relevant to this Request. Verizon Communications, Inc. maintains archives of historical documents, including surviving documents concerning Sylvania Electric Products Inc. and GTE Products Corp. Electronic searches were performed in Verizon's master records index. The results of these searches were reviewed and potentially relevant documents were identified. No documents concerning the facility were identified in this review.

See Attachment B (Confidential Business Information) for additional information responsive to this Item of the Request.

CERTIFICATION OF RESPONSES TO REQUEST

This response is not made on the basis of personal knowledge unless otherwise indicated and was prepared by or with the assistance of agents, representatives, employees and officers of OSRAM or others believed to have relevant information, and on the advice of counsel, which advice was relied upon herein. The answers set forth herein, subject to inadvertent or undiscovered errors or omissions, are based on and therefore necessarily limited by the records and information still in existence, currently recollected, thus far discovered in the course of the preparation of this response, and currently available to the undersigned. OSRAM reserves the right to supplement this response in the event that it locates additional information which makes such supplementation appropriate.

A handwritten signature in black ink, appearing to read 'Albert P. Lelis, Jr.', written over a horizontal line.

Albert P. Lelis, Jr.
Corporate EHS Manager
OSRAM SYLVANIA Inc.